

The Applicant intended to burn condensate in an open-flame Heating Medium Heater (HMH). This represented a fire hazard in this SEVESO site. The declared condensate/gas ratio in all of the Applicant's documentation to date is 0.5 bls/mcsfg. Indeed that ratio is also given on three separate pages of the IPPC licence application which was underpinned by a signed declaration by Mr. Andy Pyle as being "accurate, true and complete". How could the EPA have doubted it? However, the EPA asked the Applicant by way of Art. 11 request, what the ratio was. They replied that it was 0.05 bls/mcsfg! - a mere one-tenth of the declared ratio for five years - which would have amounted to between 177 and 200 barrels per day! How can any information this Applicant supplies be believed and what about Mr. Pyle's signed declaration?

Third parties had problems accepting the incineration of a waste product, (which is normally removed to a refinery). It would cause massive pollution so the Applicant was obviously coming under pressure to reconsider. After all, they had an abundance of natural gas! The Applicant's next move was to try to burn 'the little' condensate and then, natural gas.

For five years, the Applicant was confident of running the HMH on condensate but the crucial point is that the Applicant could never have run the HMH on 0.05 bls/mcsfg!

The Applicant was still confident of being able to retain the HMH even though they declared that heating requirements could be provided by waste heat recovery on the gas turbines as suggested by the EPA. This would save 10,000 tonnes of CO2 emissions per year! Next move was to justify retaining the HMH for one hour per week for times of extremely cold weather! When this did not appear to be opposed by the EPA, the Applicant enclosed, with their Objection to the PD, an air modelling study justifying running the HMH for three consecutive months. This study showed that there would be no real impact on air quality.

This study was accepted by the EPA AFTER their PD and AFTER third parties had sent in their Objections. This substantial 'new information' should NOT have been accepted by the EPA and its acceptance was strongly opposed by third parties.

Just before the commencement of this Oral Hearing, the Applicant withdrew their opposition to a condition in the PD regarding the usage of, and Emission Limit Values in relation to the Heating Medium Heater. The Heating Medium Heater was withdrawn altogether.

The Applicant has, since the commencement of this Oral Hearing, withdrawn the use of the proposed fire fighting foam. They have withdrawn the use of the proposed corrosion inhibitor. They suddenly, after six years, have decided that they need NOT operate in 'island mode', i.e. generate their own electricity because of no reliable outside electricity supply and will suddenly be in a position to meet the requirements of the Gothenburg Protocol for Nox emissions and make them more confident that the EPA would be in a better position to issue a licence! Where did the new reliable electricity supply pop up from in the last few days? No wonder this Applicant did not want an Oral Hearing!

OH Doc No. 15 E

Recd From: Imelda Mera

Date Recd: 26/6/07
EPA Ref: 25-07-2013:22:20:30